Todd E. Soloway tsoloway@pryorcashman.com William L. Charron wcharron@pryorcashman.com Joshua D. Bernstein jdbernstein@pryorcashman.com PRYOR CASHMAN LLP 7 Times Square New York, New York 10036-6569

Telephone: (212) 421-4100 Facsimile: (212) 326-0806

Attorneys for Plaintiff Castillo Grand, LLC

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CASTILLO GRAND, LLC,

Plaintiff,

- against -

SHERATON OPERATING CORPORATION,

Defendant.

09 CV 7197 (RPP)

NOTICE OF CROSS-MOTION

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, the Declaration of Todd E. Soloway and the exhibits annexed thereto, the undersigned will cross-move this Court before the Honorable Robert P. Patterson, Jr., United States District Judge, United States Courthouse, 500 Pearl Street, Courtroom 24A, New York, New York, on a date and time to be directed by the Court, for an Order granting plaintiff Castillo Grand, LLC's cross-motion for (i) sanctions from

Sheraton's counsel pursuant to 28 U.S.C. § 1927; and (ii) for such other and further relief as the Court deems just and proper.

Dated: New York, New York July 2, 2010

PRYOR CASHMAN LLP

Todd E. Soloway

tsoloway@pryorcashman.com

William L. Charron

wcharron@pryorcashman.com

Joshua D. Bernstein

jdbernstein@pryorcashman.com

7 Times Square

New York, New York 10036-6569

(212) 421-4100

Attorneys for Plaintiff Castillo Grand, LLC

TO: William A. Brewer III, Esq.
Bickel & Brewer
767 Fifth Avenue, 50th Floor
New York, New York 10153
(212) 489-1400
Attorneys for Defendant Sheraton Operating Corporation